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STATE OF NEW JERSEY
CASINO CONTROL COMMISSION
DOCKET NO. 11-1452-VC

STATE OF NEW JERSEY, DEPARTMENT)	
OF LAW AND PUBLIC SAFETY,)	
DIVISION OF GAMING ENFORCEMENT,)	
)	
Complainant,)	Civil Action
)	
v.)	COMPLAINT
)	
TROPICANA ATLANTIC CITY CORP.)	
d/b/a TROPICANA CASINO and RESORT,)	
)	
Respondent.)	
)	
)	

Complainant, State of New Jersey, Department of Law and Public Safety,
Division of Gaming Enforcement (hereinafter "Division"), located at 1300 Atlantic
Avenue, Atlantic City, New Jersey, 08401 says:

1. Respondent, TROPICANA ATLANTIC CITY CORP., d/b/a TROPICANA CASINO and RESORT ("Tropicana") is a New Jersey enterprise having its principal place of business at 2100 Pacific Avenue, Atlantic City, New Jersey.

2. Tropicana is the holder of a casino license first issued by the Casino Control Commission ("Commission") on November 26, 1982. At all times relevant herein, Tropicana was authorized to conduct casino gaming within its casino hotel facility.

3. N.J.A.C. 13:69D-1.42(a) provides, in pertinent part, that:

Prior to emptying or removing any slot drop bucket, slot drop box or slot cash storage box, a casino licensee shall notify the surveillance department of the transportation route that will be utilized.

4. N.J.A.C. 19:45-1.10(b) provides, in pertinent part, that:

The CCTV system shall be approved and shall include, but need not be limited to, the following

1. Light sensitive cameras, with lenses of sufficient magnification to allow the operator to read information on gaming chips, playing cards, dice, tiles, slot machine reel symbols and slot machine credit meters, and with 360 degree pan, tilt and zoom capabilities to effectively and clandestinely monitor in detail and from various vantage points, the following:

vii The movement and storage of cash, gaming chips and plaques, drop boxes, bill validator boxes, slot cash storage boxes, slot drop boxes and slot drop buckets in the establishment

5. Tropicana's Security Submission, as pertains to Emergency Slot Cash Storage Procedures provides, in pertinent part, that:

If an Emergency Slot Cash Storage Box is needed at a Bill validator location, a Slot Department Representative will contact the Slot Technician and the Security Department. Upon receiving notification, the Security Supervisor will notify the Surveillance Department...

6. On May 3, 2011, at approximately 00:58, Tropicana's surveillance log contained a notation that an emergency slot cash storage box was to be put into service at slot machine location N-145 and further noted "were NOT informed that they went to put the emergency box in N-145, Asset #3811."

7. Although the Surveillance Department recorded activity pertaining to the emergency slot cash storage box as described in Paragraph 6, above, at the security podium and the soft count trolley where emergency slot cash storage boxes are stored, the Surveillance Department did not record the activity involving the emergency slot cash storage box at slot machine N-145 or the transport of the slot cash storage box.

8. On May 15, 2011, at approximately 11:09, Tropicana's surveillance log contained a notation that an emergency slot cash storage box was to be put into service at slot machine location N-061. Upon further investigation it was determined that a second emergency slot cash storage box was put into service at 12:24, at slot

machine location P-005. On each occasion, the Security Department failed to notify the Surveillance Department of the activity.

9. Although the Security Department failed to notify the Surveillance Department of the use of emergency slot cash storage boxes, as described in Paragraph 8, above, the Surveillance Department recorded activity pertaining to the emergency slot cash storage boxes as surveillance operators, then monitoring the security department radio transmissions, overheard conversations pertaining to utilizing emergency slot cash storage boxes at locations N-061 and P-005 and independently acted to record the activity.

10. Based upon the information in Paragraphs 1 through 9, of this Complaint, on 3 occasions Tropicana's Security Department failed to notify its Surveillance Department regarding the utilization of emergency slot cash storage boxes, in violation of N.J.A.C. 13:69D-1.42(a).

11. Based upon the information in Paragraphs 1 through 9, of this Complaint, on one occasion Tropicana's Surveillance Department failed to record the utilization of an emergency slot cash storage box at location N-161, in violation of N.J.A.C. 19:45-1.10(b)1vii.

WHEREFORE, Complainant demands the following relief against Respondent, Tropicana:

A. Judgment that on 3 occasions Tropicana's Security Department failed to notify its Surveillance Department regarding the utilization of emergency slot cash storage boxes, in violation of N.J.A.C. 13:69D-1.42(a);

B. Judgment that , on 1 occasions, Tropicana's Surveillance Department failed to record the utilization of an emergency slot cash storage box at location N-161, in violation of N.J.A.C. 19:45-1.10(b)1vii;

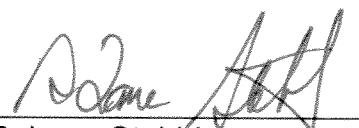
C. Judgment imposing a civil monetary penalty, pursuant to N.J.S.A. 5:12-129(5), upon Tropicana; and,

D. Judgment for such other and further relief as may be deemed just and appropriate under the circumstances.

Respectfully submitted,

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By: 
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Dated: *November 2, 2011*